

April 26, 2022

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

Signed and Filed: April 26, 2022

DENNIS MONTALI
U.S. Bankruptcy Judge1 **WEIL, GOTSHAL & MANGES LLP**

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13 *Attorneys for Debtors and Reorganized
14 Debtors*

15 **UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION**

17 In re:

18 **PG&E CORPORATION,**19 **- and -**20 **PACIFIC GAS AND ELECTRIC COMPANY,**21 **Debtors.**

22 Affects PG&E Corporation
 22 Affects Pacific Gas and Electric Company
 23 Affects both Debtors

24 * *All papers shall be filed in the Lead Case,
25 No. 19-30088 (DM).*

Case No. 19-30088 (DM)
 Chapter 11
 (Lead Case)
 (Jointly Administered)

**ORDER APPROVING STIPULATION
BY AND BETWEEN REORGANIZED
DEBTORS AND CERTAIN
CLAIMANTS (LINE 118B)**

[No Hearing Requested]

1 The Court having considered the *Stipulation By and Between Reorganized Debtors and*
2 *Certain Claimants (Line 118B)* (the “**Stipulation**”),¹ entered into by PG&E Corporation
3 (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as reorganized debtors
4 (collectively, the “**Debtors**,” and as reorganized pursuant to the Plan, the “**Reorganized**
5 **Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the 16
6 claimants listed on **Exhibit 1** attached hereto (“**Claimants**,” and, together with the Debtors and
7 Reorganized Debtors, the “**Parties**”), on the other hand, filed on April 21, 2022 [Docket
8 No. 12190]; and, pursuant to such Stipulation of the Parties, and good cause appearing,

9 **IT IS HEREBY ORDERED:**

10 1. Effective as of the date of the expiration of the WCAB Stay, the Plan Injunction
11 shall be modified solely to permit Claimants to liquidate the Proofs of Claim by prosecuting the
12 State Court Action through final judgment and any appeals thereof, but not to permit enforcement
13 of any such judgment, which judgment, if any, shall be recoverable solely as a General Unsecured
14 Claim in accordance with the Plan and through the claims reconciliation process in these Chapter
15 11 Cases.

16 2. Nothing herein is intended, nor shall it be construed, to be:

- 17 a. a waiver by the Debtors or the Reorganized Debtors, as applicable, or any
18 other party in interest, of any right to object to the Proofs of Claim on any
19 grounds, or
- 20 b. a waiver by any of the Claimants of their rights to assert any right in
21 opposition of any asserted challenge to the Proofs of Claim, or
- 22 c. a waiver by any Party of any claim or defense in the State Court Action or
23 the WCAB Proceedings.

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26 ¹ Capitalized terms used but not herein defined shall have the meanings ascribed to them in the
27 Stipulation.
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1 3. The Stipulation shall be binding on the Parties and each of their successors in interest.

2 4. The Stipulation shall constitute the entire agreement and understanding of the Parties
3 relating to the subject matter hereof and supersede all prior agreements and understandings relating
4 to the subject matter hereof.

5 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
6 controversies arising from the Stipulation or this Order.

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8 APPROVED AS TO FORM AND CONTENT:

9 [*Signatures on Next Page*]
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1 Dated: April 21, 2022

2 KELLER BENVENUTTI KIM LLP

3 */s/ David A. Taylor*

4 David A. Taylor

5 *Attorneys for Debtors*
6 *and Reorganized Debtors*

7 BARADAT & PABOOJIAN, INC.

8 */s/ Adam B. Stirrup*

9 Adam B. Stirrup

10 *Attorneys for Claimant Efrain S. Garcia*

11 LAZARO SALAZAR LAW, INC.

12 */s/ Lazaro Salazar*

13 Lazaro Salazar

14 *Attorneys for Claimants Juan Pablo*
15 *Chagoya Gonzalez and Monica Andrade*
16 *Sanchez*

17 PETRIE LEATH LARRIVEE &
18 O'ROURKE, LLP

19 */s/ J. David Petrie*

20 J. David Petrie

21 *Attorneys for Claimant Fresno County*
22 *Peace Officers Association*

23 WAGNER, JONES, KOPFMAN &
24 ARTEMIAN LLP

25 */s/ Nicholas Wagner*

26 Nicholas Wagner

27 *Attorneys for Claimants Sam Ouk, Edgar*
28 *Torres, Gabino Alberto Pizano, Kao Hang,*
29 *and Fidel Ramirez*

30 LAW OFFICES OF ARA
31 JABAGCHOURIAN, P.C.

32 */s/ Ara Jabagchourian*

33 Ara Jabagchourian

34 *Attorneys for Claimants Espino Family,*
35 *Rosario Lara, and Victor Castaneda*

36 BORTON PETRINI, LLP

37 */s/ Bradley A. Post*

38 Bradley A. Post

39 *Attorneys for Claimant Sheriff's*
40 *Foundation for Public Safety*

41 *** END OF ORDER ***

Exhibit 1

Claimant Name(s)	Claim Number
Victor Castaneda	1530
Juan Pablo Chagoya and Monica Andrade	1766
Carmen Espino	1808
Christina Espino	1851
Grace Espino	1849
Jeremias Espino	1852
Fresno County Peace Officers Association	19845
Efrain Garcia	1467
Juan Pablo Chagoya Gonzalez	20008
Kai Hang	3625
Rosario Lara	1920
Sam Ouk	3685
Gabino Alberto Pizano	3622
Fidel Ramirez	3901
Monica Andrade Sanchez	19914
Sheriffs Foundation for Public Safety, Inc.	78362
Sheriffs Foundation for Public Safety, Inc.	58385
Edgar Torres	3623